

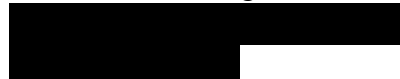
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INVOICE

Invoice # 38
Date: 12/22/2020

Jose E. Franco Lagos



Titan

Services

| Attorney | Date | Notes | Quantity | Rate | Total |
|----------|------------|--|----------|----------|----------|
| VM | 12/12/2019 | Telephone call with Pechman and David Harrison, co-counsel, re: adding plaintiffs to his case. | 0.30 | \$400.00 | \$120.00 |
| VM | 12/12/2019 | Meeting with Jacobo Hernandez and Johnny Raynel. | 1.80 | \$400.00 | \$720.00 |
| LP | 12/12/2019 | Telephone conference with Harrison and Morales re: additional plaintiffs. | 0.30 | \$600.00 | \$180.00 |
| VM | 12/16/2019 | Telephone call to Plaintiffs | 0.20 | \$400.00 | \$80.00 |

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| | | to sign consent to sues. | | | |
| VM | 12/17/2019 | Meeting with Jacobo Hernandez, email to Harrison, and email to Glenn Grindlinger re: clients opting into action. | 0.60 | \$400.00 | \$240.00 |
| VM | 12/17/2019 | Telephone call with potential plaintiff, brother of Jose Franco, file consent to sues in SDNY filed matter. | 0.70 | \$400.00 | \$280.00 |
| VM | 12/17/2019 | Draft consent to sue, meeting with Lagos re: signing consent to sue form. | 0.30 | \$400.00 | \$120.00 |
| LP | 12/17/2019 | Meeting with plaintiff Lagos re: joining case. | 0.30 | \$600.00 | \$180.00 |
| GB | 01/30/2020 | Call with mediator, Glenn Grindlinger, David Harrison, and Morales re scheduling. | 0.40 | \$275.00 | \$110.00 |
| GB | 01/30/2020 | TC with David Harrison and Morales in preparation for call with opposing counsel and mediator. | 0.50 | \$275.00 | \$137.50 |
| VM | 01/30/2020 | Telephone call with Baynes, Grindlinger, Harrison and Ed Donovan (mediator) re: mediation. | 0.40 | \$400.00 | \$160.00 |
| VM | 01/30/2020 | Review file in preparation of telephone call with mediator and counsel. | 0.20 | \$400.00 | \$80.00 |
| VM | 01/30/2020 | Telephone call with Harrison regarding mediation and to prepare for telephone call with mediator and opposing | 0.50 | \$400.00 | \$200.00 |

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| | | counsel. | | | |
| VM | 01/31/2020 | Review documents provided by Plaintiffs, organize into dropbox, share with Harrison. | 0.40 | \$400.00 | \$160.00 |
| VM | 02/24/2020 | Telephone call with Harrison re: adding allegations for plaintiffs to amended complaint. | 0.20 | \$400.00 | \$80.00 |
| VM | 02/25/2020 | Telephone call with Lagos re: status and allegations in amended complaint. | 0.20 | \$400.00 | \$80.00 |
| VM | 02/25/2020 | Edit Amended Complaint to include allegations for plaintiffs Franco and Hernandez. | 0.80 | \$400.00 | \$320.00 |
| VM | 03/03/2020 | Telephone call with Grindlinger, David Harrison, Ed Donovan, mediator, and Baynes re: scheduling mediation. | 0.70 | \$400.00 | \$280.00 |
| GB | 03/03/2020 | Review 3/2/20 correspondence from Grindlinger alleging deficiencies in the amended complaint. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/03/2020 | Telephone conference with opposing counsel and mediator to discuss mediation date and planned motion to dismiss. | 0.70 | \$275.00 | \$192.50 |
| GB | 03/04/2020 | TC with Harrison and Morales re: developing response to Titan's motion to | 0.20 | \$275.00 | \$55.00 |

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| | | dismiss. | | | |
| GB | 03/04/2020 | Review cases cited in Titan's pre-motion to dismiss letter re: joint enterprise liability and begin researching case law to develop response. | 0.80 | \$275.00 | \$220.00 |
| GB | 03/04/2020 | Discuss joint employer and integrated enterprise theories and response to motion to dismiss letter with Morales. | 0.10 | \$275.00 | \$27.50 |
| VM | 03/04/2020 | Telephone call with Harrison and Baynes re: motion to dismiss; discussion with Baynes re: same. | 0.30 | \$400.00 | \$120.00 |
| GB | 03/05/2020 | Draft response to Titan's argument in its pre-motion to dismiss letter that the amended complaint fails to sufficiently allege a single integrate enterprise theory. | 1.80 | \$275.00 | \$495.00 |
| VM | 03/05/2020 | Review letter drafted by Grindlinger re: pre-conference letter motion to dismiss. | 0.10 | \$400.00 | \$40.00 |
| GB | 03/05/2020 | Continue legal research to develop response to Titan's pre-motion letter to dismiss. | 0.80 | \$275.00 | \$220.00 |
| VM | 03/06/2020 | Review/edit response letter to Defendants' pre-motion letter to dismiss Complaint. | 2.90 | \$400.00 | \$1,160.00 |
| VM | 03/09/2020 | Telephone call with Stephen Hernandez re: scheduling intake meeting for him and ten more employees, discuss | 0.30 | \$400.00 | \$120.00 |

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| | | with Pechman. | | | |
| LP | 03/09/2020 | Discussion with Morales re: potential additional plaintiffs. | 0.20 | \$600.00 | \$120.00 |
| VM | 03/10/2020 | Edit opposition to motion to dismiss letter. | 0.20 | \$400.00 | \$80.00 |
| VM | 03/11/2020 | Telephone call to Hernandez to change appointment, forward information to Brito to msg via whatsapp. | 0.10 | \$400.00 | \$40.00 |
| VM | 03/11/2020 | Telephone call with Stephen Hernandez re: upcoming appointment. | 0.20 | \$400.00 | \$80.00 |
| GB | 03/12/2020 | Upload and organize retainers, consent to sue forms, and intake forms for clients retained 3/12/20. Input client info into FileMaker. | 0.40 | \$275.00 | \$110.00 |
| GB | 03/12/2020 | Consults with five additional employees. Retainers drafted and signed. | 3.30 | \$275.00 | \$907.50 |
| GB | 03/12/2020 | Review case file from Titan I and current case in preparation for taking over case during Morales leave. | 0.70 | \$275.00 | \$192.50 |
| LP | 03/12/2020 | Telephone conference with David Harrison re: approach. | 0.20 | \$600.00 | \$120.00 |
| GB | 03/12/2020 | TC with Harrison, Morales, and Pechman re: new clients and potential settlement. | 0.20 | \$275.00 | \$55.00 |
| LP | 03/12/2020 | Attend portion of meeting with additional plaintiffs. | 0.60 | \$600.00 | \$360.00 |

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| VM | 03/12/2020 | Telephone call with Harrison, Pechman and Baynes re: status. | 0.20 | \$400.00 | \$80.00 |
| VM | 03/16/2020 | Review premotion letter submitted to Judge Torres by Grindlinger. | 0.10 | \$400.00 | \$40.00 |
| VM | 03/17/2020 | Discuss matter with Galen. | 0.10 | \$400.00 | \$40.00 |
| GB | 03/17/2020 | Discussion with Morales re: Titan matter. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/20/2020 | Attempt to return call to Angel Lobo for consult. No answer or voicemail. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/20/2020 | Discussion with Morales re: moving forward with consults and damage calculations for new clients. | 0.20 | \$275.00 | \$55.00 |
| GB | 03/20/2020 | Review consult notes in preparation for call with potential new client Martinez. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/20/2020 | TC with Stevens Hernandez to inform that other employees who would like to join should call us promptly if they want to be included. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/20/2020 | Consult with Angel Lobo, new potential client for Titan. | 0.50 | \$275.00 | \$137.50 |
| VM | 03/20/2020 | Email with Harrison re: status of case. | 0.10 | \$400.00 | \$40.00 |
| LP | 03/20/2020 | Telephone conference with David Harrison re: strategy, | 0.40 | \$600.00 | \$240.00 |

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| | | background and next steps. | | | |
| GB | 03/20/2020 | Begin drafting damage calculations for newly-retained plaintiffs. | 2.30 | \$275.00 | \$632.50 |
| VM | 03/20/2020 | Discussion with Galen re: status. | 0.20 | \$400.00 | \$80.00 |
| GB | 03/23/2020 | Leave VM for Jesus Ramirez requesting call back to confirm details re: work schedule. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/23/2020 | Prepare retainer and consent to sue form for Angel Lobo. | 0.30 | \$275.00 | \$82.50 |
| GB | 03/23/2020 | Upload Angel Lobo retainer and consent to sue forms through DocuSign and send for signature. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/23/2020 | TC with Morales and Harrison re: response to motion to dismiss and damage calculations for new clients. | 0.20 | \$275.00 | \$55.00 |
| GB | 03/23/2020 | Revise Jesus Ramirez damage calculations. | 0.30 | \$275.00 | \$82.50 |
| GB | 03/23/2020 | TC with Jesus Ramirez to confirm details re: work schedule. | 0.20 | \$275.00 | \$55.00 |
| GB | 03/23/2020 | TC with Angel Lobo to obtain email address. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/23/2020 | Draft damage calculations for Jacobo Hernandez and compile damages for all PGL clients into one document. | 0.70 | \$275.00 | \$192.50 |

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| VM | 03/23/2020 | Review damages for opt-in's, discuss with Baynes. | 0.90 | \$400.00 | \$360.00 |
| VM | 03/23/2020 | TC with Harrison and Baynes re: response to motion to dismiss and damages calculations. | 0.20 | \$400.00 | \$80.00 |
| GB | 03/23/2020 | Discussion with Morales re: damages for opt-ins. | 0.60 | \$275.00 | \$165.00 |
| GB | 03/24/2020 | Review response to pre-motion to dismiss letter drafted by Harrison. | 0.20 | \$275.00 | \$55.00 |
| VM | 03/24/2020 | Email exchanges with David Harrison re: letter response to Defendants' pre-conference motion to dismiss. | 0.20 | \$400.00 | \$80.00 |
| GB | 03/24/2020 | Print and return retainer to Angel Lobo. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/25/2020 | Review and revise joint letter to Judge Torres and proposed case management plan drafted by Grindlinger. | 0.60 | \$275.00 | \$165.00 |
| GB | 03/25/2020 | Review and download Judge Torres' 3/25/20 order setting deadlines re: defendants' motion to dismiss. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/25/2020 | Download and save Judge Torres' individual rules and COVID-19 emergency rules. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/25/2020 | Prepare and file notice of appearance., | 0.20 | \$275.00 | \$55.00 |
| GB | 03/26/2020 | Download and save joint pre-conference letter and | 0.10 | \$275.00 | \$27.50 |

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| | | case management plan filed on ECF. | | | |
| GB | 03/31/2020 | Email to Harrison re damage calculations. | 0.10 | \$275.00 | \$27.50 |
| GB | 03/31/2020 | Discuss Harrison response re damage calculations and settlement demand with Morales and reply to Harrison. | 0.10 | \$275.00 | \$27.50 |
| VM | 03/31/2020 | Discussion with Baynes re: Harrison's response to damages calculations. | 0.10 | \$400.00 | \$40.00 |
| GB | 04/01/2020 | Discussion with Morales re: filing consent forms. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/01/2020 | File consents to be party plaintiff for six new clients retained by PLG. | 0.80 | \$275.00 | \$220.00 |
| VM | 04/01/2020 | Review email from Harrison to Grindlinger with damages, discuss edits with Baynes. | 0.20 | \$400.00 | \$80.00 |
| GB | 04/01/2020 | TC with Harrison re draft email to Grindlinger with damage calculations and filing of consent forms. | 0.20 | \$275.00 | \$55.00 |
| VM | 04/01/2020 | Review pleadings and damages in preparation for initial conference. | 0.50 | \$400.00 | \$200.00 |
| GB | 04/02/2020 | Research time for service of amended complaint. | 0.20 | \$275.00 | \$55.00 |
| GB | 04/02/2020 | Participate in initial conference with Judge Torres. | 0.10 | \$275.00 | \$27.50 |

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| GB | 04/02/2020 | Review complaint and pre-conference submissions in preparation for initial conference with Judge Torres. | 0.50 | \$275.00 | \$137.50 |
| VM | 04/02/2020 | Attend initial conference by telephone. | 0.10 | \$400.00 | \$40.00 |
| GB | 04/02/2020 | Calculate total damages (wages only) across plaintiffs in preparation for initial conference with Judge Torres. | 0.30 | \$275.00 | \$82.50 |
| GB | 04/02/2020 | Email to Harrison re: service of amended complaint on non-appearing defendants. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/08/2020 | Discuss service of amended complaint through secretary of state with Pechman. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/08/2020 | Review docket and research rules on time for service of amended complaint on non-appearing defendants. | 0.70 | \$275.00 | \$192.50 |
| GB | 04/08/2020 | Draft email to Poole (process server) regarding operations and ability to serve process on secretary of state during coronavirus. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/08/2020 | Email to Harrison providing update re: service of process. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/08/2020 | Call Poole (process server for secretary of state filings) to determine whether open. Closed because of coronavirus. Confirm that | 0.20 | \$275.00 | \$55.00 |

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| | | secretary of state is only accepting process by appointment. | | | |
| GB | 04/08/2020 | Discuss service of amended complaint on non-appearing defendants with Morales. | 0.20 | \$275.00 | \$55.00 |
| VM | 04/08/2020 | Discussion with Baynes re: service on secretary of state. | 0.20 | \$400.00 | \$80.00 |
| LP | 04/08/2020 | Discussion with Baynes re: service of amended complaint. | 0.10 | \$600.00 | \$60.00 |
| GB | 04/14/2020 | Email to Harrison re: update on service of amended complaint through secretary of state. | 0.20 | \$275.00 | \$55.00 |
| GB | 04/15/2020 | Email to Alexander Poole re arranging for service on secretary of state by email. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/15/2020 | Call offices of Alexander Poole re: service on secretary of state after receiving message saying they are able to effect service. No answer with voice message stating they are closed. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/20/2020 | Pull entity information from department of state website for each of non-appearing defendants. Draft and send request to Alexander Poole (service company) for service of amended complaint on non-appearing defendants through the | 0.30 | \$275.00 | \$82.50 |

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| | | secretary of state. | | | |
| VM | 04/20/2020 | Review email to process server, reply to Baynes. | 0.10 | \$400.00 | \$40.00 |
| GB | 04/20/2020 | Review FRCP and respond to Morales inquiry re necessity of requesting and serving summons along with amended complaint on non-appearing defendants who were served with original complaint. | 0.20 | \$275.00 | \$55.00 |
| GB | 04/23/2020 | Download from ECF and initial read through of Titan's motion to dismiss. | 0.30 | \$275.00 | \$82.50 |
| GB | 04/27/2020 | Prepare Pechman notice of appearance and send to Pechman for review. | 0.20 | \$275.00 | \$55.00 |
| GB | 04/27/2020 | Email to Harrison to arrange TC re: motion to dismiss. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/27/2020 | Download Alexander Poole receipt and record expense. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/27/2020 | TC with Pechman re payment to Alexander Poole for service on secretary of state on pending MTD. Forward copy of MTD to Pechman. | 0.20 | \$275.00 | \$55.00 |
| VM | 04/27/2020 | Review motion to dismiss filed by Titan Construction. | 0.60 | \$400.00 | \$240.00 |
| GB | 04/27/2020 | Review Cheeks opinion in Guajardo v. Titan provided by Pechman. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/27/2020 | TC with Alexander Poole | 0.20 | \$275.00 | \$55.00 |

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| | | representative confirming service on secretary of state and providing billing information. | | | |
| LP | 04/27/2020 | Review notice of apperance. | 0.10 | \$600.00 | \$60.00 |
| LP | 04/27/2020 | Review Titan's motion to dismiss. | 0.30 | \$600.00 | \$180.00 |
| GB | 04/28/2020 | Review Titan MTD in preparation for call with Harrison. | 0.40 | \$275.00 | \$110.00 |
| VM | 04/28/2020 | Discuss responding to motion to dismiss with Baynes. | 0.10 | \$400.00 | \$40.00 |
| GB | 04/28/2020 | Discuss organizing response to Titan MTD with Morales. | 0.10 | \$275.00 | \$27.50 |
| GB | 04/28/2020 | Email to Harrison re: dividing responsibilities for Titan MTD. | 0.10 | \$275.00 | \$27.50 |
| GB | 05/04/2020 | Review Titan motion to dismiss and cases cited; begin outlining response. | 1.30 | \$275.00 | \$357.50 |
| GB | 05/06/2020 | Draft opposition to motion to dismiss (response to motion to dismiss Titan as defendant). | 2.90 | \$275.00 | \$797.50 |
| GB | 05/06/2020 | Call to Poole following up re service of documents. Office currently closed, sent email. | 0.10 | \$275.00 | \$27.50 |
| GB | 05/06/2020 | Research cases cited in motion to dismiss re: Rule 8 standard. | 0.50 | \$275.00 | \$137.50 |
| GB | 05/07/2020 | Continue drafting opposition | 4.40 | \$275.00 | \$1,210.00 |

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| | | to motion to dismiss (corporate defendant Titan). | | | |
| GB | 05/08/2020 | Discuss draft response to MTD with Pechman and send to Harrison. | 0.20 | \$275.00 | \$55.00 |
| LP | 05/08/2020 | Discussion with Baynes re: motion to dismiss response. | 0.10 | \$600.00 | \$60.00 |
| GB | 05/11/2020 | TC with Harrison re opposition to motion to dismiss. | 0.50 | \$275.00 | \$137.50 |
| GB | 05/12/2020 | Perform additional research into Rule 8 standard in FLSA cases and imputation of a corporate officer's acts to a corporate defendant. | 1.70 | \$275.00 | \$467.50 |
| GB | 05/12/2020 | Make revisions to opposition to motion to dismiss. | 1.00 | \$275.00 | \$275.00 |
| GB | 05/12/2020 | Review Titan's pre-motion letter to highlight arguments that were raised for the first time in the motion to dismiss. | 0.30 | \$275.00 | \$82.50 |
| GB | 05/12/2020 | TC with Harrison and Salwen re opposition to motion to dismiss. | 0.40 | \$275.00 | \$110.00 |
| LP | 05/12/2020 | Review and revise opposition to motion to dismiss. | 0.30 | \$600.00 | \$180.00 |
| GB | 05/13/2020 | Review and revise opposition to motion to dismiss edited by Salwen and send back for review. | 1.40 | \$275.00 | \$385.00 |
| GB | 05/14/2020 | File Pechman notice of | 0.10 | \$275.00 | \$27.50 |

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| | | appearance. | | | |
| GB | 05/14/2020 | Email to Harrison re discovery deadlines. | 0.10 | \$275.00 | \$27.50 |
| GB | 05/14/2020 | Separate and file affidavits of service of amended complaint on non-appearing corporate defendants. | 0.50 | \$275.00 | \$137.50 |
| GB | 05/14/2020 | Email to Harrison re agreeing to discovery deadline extensions with defendants. | 0.20 | \$275.00 | \$55.00 |
| GB | 05/28/2020 | TC with Luis Martinez, interested in joining case as an opt-in. Email to Pechman to confirm whether we can bring him on at this stage. | 0.30 | \$275.00 | \$82.50 |
| LP | 05/28/2020 | Email exchange with Baynes re: additional opt-in. | 0.10 | \$600.00 | \$60.00 |
| GB | 05/29/2020 | TC with Lagos re case update. | 0.20 | \$275.00 | \$55.00 |
| GB | 05/29/2020 | TC with Stevens Hernandez re case update. | 0.10 | \$275.00 | \$27.50 |
| GB | 05/29/2020 | Draft WhatsApp message to Stevens Hernandez. | 0.10 | \$275.00 | \$27.50 |
| GB | 05/29/2020 | Attempt to call Stevens Hernandez for case update, no answer, no VM. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/01/2020 | Email to Harrison re discovery and potential new opt-in. | 0.20 | \$275.00 | \$55.00 |
| GB | 06/03/2020 | TC with Harrison re responses to document | 0.50 | \$275.00 | \$137.50 |

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| | | requests and interrogatories. | | | |
| GB | 06/03/2020 | Review defendants' initial disclosures, document requests, and interrogatories. | 0.50 | \$275.00 | \$137.50 |
| GB | 06/03/2020 | Follow-up TC with Harrison re: document requests. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/04/2020 | Consult with Luis Martinez, new opt-in. | 1.10 | \$275.00 | \$302.50 |
| GB | 06/04/2020 | Draft Luis Martinez retainer and opt-in form and send to Medina for delivery through Docusign. | 0.40 | \$275.00 | \$110.00 |
| GB | 06/04/2020 | Download Gemini v. Titan opinion (Pauley) (insurance case but with similar employer issues.) | 0.10 | \$275.00 | \$27.50 |
| GB | 06/05/2020 | Email to Harrison re: Gemini case with findings from Judge Pauley on Titan corporate structure. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/05/2020 | Download signed retainer and consent to sue form for Luis Martinez and file consent to sue. | 0.20 | \$275.00 | \$55.00 |
| GB | 06/08/2020 | Review templates and begin drafting Franco discovery response template. | 0.50 | \$275.00 | \$137.50 |
| GB | 06/09/2020 | Leave voicemail for Jacobo requesting call back re discovery. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/10/2020 | Leave message for Harrison re discovery. | 0.10 | \$275.00 | \$27.50 |

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| GB | 06/10/2020 | TC with Jacobo Hernandez, provides new phone number. | 0.20 | \$275.00 | \$55.00 |
| GB | 06/10/2020 | TC with Harrison re: discovery | 0.20 | \$275.00 | \$55.00 |
| GB | 06/16/2020 | TC with Luis Martinez, confirming that he has been added as opt-in to case. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/17/2020 | Draft discovery responses. | 3.30 | \$275.00 | \$907.50 |
| GB | 06/18/2020 | Continue drafting responses to requests for production of documents. | 4.70 | \$275.00 | \$1,292.50 |
| GB | 06/19/2020 | Finalize template for document request responses and send to Harrison. | 0.90 | \$275.00 | \$247.50 |
| GB | 06/19/2020 | Draft damages for Luis Martinez and send to Harrison. | 0.30 | \$275.00 | \$82.50 |
| GB | 06/23/2020 | Email to Harrison re call on Titan discovery. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/24/2020 | Attempt to access DropBox account and email to Salwen. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/24/2020 | TC with Harrison re productions. | 0.30 | \$275.00 | \$82.50 |
| GB | 06/26/2020 | Review interrogatories and records in preparation and TCs with Franco and Hernandez to review interrogatories. | 1.40 | \$275.00 | \$385.00 |
| GB | 06/26/2020 | Scan additional checks from Jose Franco and send to Harrison for inclusion in | 0.40 | \$275.00 | \$110.00 |

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| | | production. | | | |
| GB | 06/26/2020 | TC with Franco to confirm WhatsApp. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/28/2020 | Review interrogatory response template provided by Harrison. Update and resend document request template to Harrison. | 1.00 | \$275.00 | \$275.00 |
| GB | 06/29/2020 | Review information provided by Hernandez and Franco and draft interrogatory responses. | 0.30 | \$275.00 | \$82.50 |
| GB | 06/29/2020 | Email to co-counsel re document productions. | 0.10 | \$275.00 | \$27.50 |
| GB | 06/29/2020 | Finalize document request and interrogatory responses for Franco and Hernandez. | 3.40 | \$275.00 | \$935.00 |
| GB | 06/30/2020 | Final review of interrogatory responses with Franco and request email to send through Docusign for signature. | 0.20 | \$275.00 | \$55.00 |
| GB | 06/30/2020 | TCs with clients to walk through DocuSign. Compile and send over finalized interrogatory and document request responses to Harrison. | 0.80 | \$275.00 | \$220.00 |
| GB | 06/30/2020 | Email to Harrison re revised document production. Revise R&Os accordingly and resend to Harrison. | 1.00 | \$275.00 | \$275.00 |
| GB | 06/30/2020 | Add certificates of service to | 0.70 | \$275.00 | \$192.50 |

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| | | doc requests and interrogatories; create DropBox file for document productions and send to opposing counsel. | | | |
| GB | 07/21/2020 | TC with Harrison, advising about letter of reference produced by Dolores with signature from Eric Mercado confirming status as a Titan employee. | 0.30 | \$275.00 | \$82.50 |
| GB | 07/22/2020 | Email with Harrison re opposing counsel's request for extension of time to respond to discovery requests. | 0.10 | \$275.00 | \$27.50 |
| GB | 07/22/2020 | Organize file with discovery requests/responses. | 0.50 | \$275.00 | \$137.50 |
| GB | 07/23/2020 | Review damage calculations and discuss Harrison's letter service issue with Pechman; revise damage calculations to incorporate new opt-in Martinez and calculate total demand across all clients; email to Harrison re: service of Mercado letter and revised damages on opposing counsel. | 0.90 | \$275.00 | \$247.50 |
| GB | 07/23/2020 | Initial review of defendants' discovery deficiency letter. | 0.20 | \$275.00 | \$55.00 |
| LP | 07/23/2020 | Discussion with Baynes re: Harrison's letter service issue. | 0.10 | \$600.00 | \$60.00 |
| VM | 07/30/2020 | Review memoranda | 0.80 | \$400.00 | \$320.00 |

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| | | opposing motion to dismiss and supporting case law. | | | |
| VM | 07/30/2020 | Review discovery deficiency letter sent by Grindlinger. | 0.40 | \$400.00 | \$160.00 |
| GB | 07/31/2020 | Begin drafting response to defendants' deficiency letter. | 2.80 | \$275.00 | \$770.00 |
| GB | 08/03/2020 | Continue drafting response to defendants' deficiency letter. Send to Pechman and Morales for review. | 1.20 | \$275.00 | \$330.00 |
| LP | 08/03/2020 | Review and revise response to defendants' deficiency letter. | 0.30 | \$600.00 | \$180.00 |
| VM | 08/03/2020 | Review and edit draft response to defendants' deficiency letter. | 0.30 | \$400.00 | \$120.00 |
| GB | 08/03/2020 | Incorporate Morales revisions into response to defendants' deficiency letter and send to Harrison for review. | 1.50 | \$275.00 | \$412.50 |
| GB | 08/06/2020 | Email to Harrison re setting up call on deficiency letter. | 0.10 | \$275.00 | \$27.50 |
| GB | 08/07/2020 | TC with Morales and Harrison re: strategy for response to deficiency letter and supplemental productions. | 0.70 | \$275.00 | \$192.50 |
| VM | 08/07/2020 | Review Defendants' deficiency letter draft prior to call with Harrison and Baynes re: response to defendants' discovery | 0.50 | \$400.00 | \$200.00 |

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| | | deficiency letter. | | | |
| VM | 08/07/2020 | Telephone call with Harrison and Baynes re: response to Defendants' discovery deficiency letter. | 0.70 | \$400.00 | \$280.00 |
| GB | 08/18/2020 | Revise response to deficiency letter following discussions with Morales and Harrison. | 1.10 | \$275.00 | \$302.50 |
| VM | 08/18/2020 | Review defendants' discovery deficiency letter and provide edits to Baynes. | 0.50 | \$400.00 | \$200.00 |
| GB | 08/18/2020 | Draft second request for production of documents. | 0.40 | \$275.00 | \$110.00 |
| GB | 08/19/2020 | Email to Harrison re response to deficiency letter and supplemental document request. | 0.10 | \$275.00 | \$27.50 |
| GB | 08/21/2020 | Telephone call with Harrison and Morales re: finalizing response to deficiency letter. | 0.40 | \$275.00 | \$110.00 |
| VM | 08/21/2020 | Telephone call with Harrison and Baynes regarding finalizing deficiency letter and additional production. | 0.40 | \$400.00 | \$160.00 |
| GB | 08/25/2020 | Telephone calls with Hernandez and Franco Lagos re: case update, continued discovery process. | 0.20 | \$275.00 | \$55.00 |
| GB | 08/26/2020 | Telephone call with Harrison re: response to deficiency letter and production. | 0.20 | \$275.00 | \$55.00 |
| GB | 08/27/2020 | Review production; | 1.40 | \$275.00 | \$385.00 |

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| | | incorporate Harrison revisions to response to deficiency letter; finalize deficiency letter and exhibits and send to Grindlinger. | | | |
| GB | 09/02/2020 | Create account for access to and download and save Defendants' document productions. | 0.30 | \$275.00 | \$82.50 |
| GB | 09/09/2020 | Review and take notes on Titan Defendants' interrogatory responses. | 0.50 | \$275.00 | \$137.50 |
| GB | 09/10/2020 | Begin reviewing Titan Defendants' 700-page document production. | 2.50 | \$275.00 | \$687.50 |
| GB | 09/11/2020 | Telephone call with Luis Martinez re: case updated. Explain discovery phase and pending MTD. | 0.20 | \$275.00 | \$55.00 |
| GB | 09/16/2020 | Continued review of Titan discovery responses; compile notes on discovery and send to Morales to prepare for discussion of strategy moving forward with Harrison. | 0.70 | \$275.00 | \$192.50 |
| VM | 09/17/2020 | Review e-mail from Baynes regarding defendants' document production and next steps. | 0.50 | \$400.00 | \$200.00 |
| GB | 09/17/2020 | Discussion with Morales re: paper discovery, potential depositions, and strategy pending decision on motion to dismiss. | 0.40 | \$275.00 | \$110.00 |

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| VM | 09/17/2020 | Telephone call with Baynes regarding strategy. | 0.40 | \$400.00 | \$160.00 |
| GB | 09/21/2020 | Email to Harrison re: scheduling call to discuss mediation and defendants' discovery responses. | 0.10 | \$275.00 | \$27.50 |
| GB | 09/21/2020 | Telephone call with Harrison re: email to Grindlinger to determine defendants' position re: mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 09/23/2020 | Draft agenda for meeting with Harrison re mediation and strategy for discovery moving forward. | 0.10 | \$275.00 | \$27.50 |
| GB | 09/23/2020 | Telephone call with Harrison and Pechman re: selection of mediator, motion for extension of discovery deadline pending mediation, and deficiency letter. | 0.40 | \$275.00 | \$110.00 |
| LP | 09/23/2020 | Telephone conference with Harrison and Baynes re: status and next steps. | 0.40 | \$600.00 | \$240.00 |
| GB | 09/23/2020 | Review Titan discovery responses to identify deficiencies with respect to email chains, text messages, and payments to alleged subcontractors. Draft deficiency letter. Send to Harrison and Pechman for review. | 1.60 | \$275.00 | \$440.00 |
| GB | 09/23/2020 | Telephone call with Angel Lobo re: case updated. Explain pending motion to | 0.10 | \$275.00 | \$27.50 |

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| | | dismiss, discovery process, and potential mediation. | | | |
| VM | 09/23/2020 | Review deficiency letter. | 0.40 | \$400.00 | \$160.00 |
| GB | 09/23/2020 | Finalize and send plaintiffs' deficiency letter in response to Titan Defendants' responses to document requests. | 0.10 | \$275.00 | \$27.50 |
| LP | 09/23/2020 | Review Titan discovery responses. | 0.30 | \$600.00 | \$180.00 |
| GB | 09/24/2020 | Discussion with Morales and Pechman re preferred mediation dates. | 0.10 | \$275.00 | \$27.50 |
| GB | 09/25/2020 | Email to Harrison re: proposed mediation dates. | 0.10 | \$275.00 | \$27.50 |
| LP | 09/25/2020 | Email exchanges with counsel and JAMS re: mediation scheduling. | 0.10 | \$600.00 | \$60.00 |
| GB | 09/28/2020 | Review Titan Defendants' response to second request for production of documents. | 0.10 | \$275.00 | \$27.50 |
| GB | 09/29/2020 | Revise case summary for JAMS mediator provided by Goodman and send to Harrison. | 0.30 | \$275.00 | \$82.50 |
| GB | 09/29/2020 | Incorporate Harrison revisions and send revised mediation overview for JAMS to Goodman. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/02/2020 | Email to Grindlinger and Goodman re: filing request for extension of discovery deadlines now that | 0.10 | \$275.00 | \$27.50 |

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| mediation date has been set. | | | | | |
| GB | 10/05/2020 | Emails to Harrison and Goodman re: proposed request for extension of discovery deadlines. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/05/2020 | Discussion with Brito re contacting plaintiffs to block out November 17 tentative mediation date. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/05/2020 | Retrieve Angel Lobo and Jesus Ramirez contact information for Brito to make calls re mediation date. | 0.10 | \$275.00 | \$27.50 |
| VM | 10/05/2020 | Review letter requesting extension from court, discuss with Baynes. | 0.10 | \$400.00 | \$40.00 |
| GB | 10/07/2020 | Review JAMS agreement and policies and procedures. | 0.20 | \$275.00 | \$55.00 |
| GB | 10/08/2020 | Telephone call with Brancato (JAMS) inquiring re need for all attorneys appearing to sign mediation agreement. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/08/2020 | Download and review order extending discovery deadlines. Update calendar. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/13/2020 | Review JAMS fee deposit request. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/15/2020 | Email to Harrison re: mediation deposit and scheduling call to discuss strategy. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/16/2020 | Telephone call with Angel | 0.10 | \$275.00 | \$27.50 |

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| Lobo re case update. | | | | | |
| GB | 10/19/2020 | Email to Harrison re: call on mediation and inquiry re: response from JAMS about mediation charges. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/21/2020 | Review file and settlement agreement in prior case in preparation for call with Harrison re mediation. | 0.30 | \$275.00 | \$82.50 |
| GB | 10/21/2020 | Telephone call with Harrison and Pechman re: mediation preparation, following up with JAMS, and coordinating presence of plaintiffs at mediation. | 0.40 | \$275.00 | \$110.00 |
| GB | 10/21/2020 | Review damages provided by Harrison. Incorporate PLG client's individual damage sheets and damages for Luis Martinez. Review damages breakdowns for mediation. | 0.60 | \$275.00 | \$165.00 |
| LP | 10/21/2020 | Telephone conference with Baynes and co-counsel Harrison re: approach to mediation. | 0.40 | \$600.00 | \$240.00 |
| GB | 10/21/2020 | Email to Pechman re calculation of total damages and percentage breakdowns. | 0.10 | \$275.00 | \$27.50 |
| LP | 10/21/2020 | Review damages calculations. | 0.20 | \$600.00 | \$120.00 |
| GB | 10/22/2020 | Continued revisions to damages calculations for mediation purposes to freeze | 0.50 | \$275.00 | \$137.50 |

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| | | interest accrual and limit to SOL period for Franco Lagos. Email to Harrison re: SOL issues in damage calculations for Harrison clients. | | | |
| GB | 10/22/2020 | Review and respond to Goodman email advising re: delay in response to deficiency letter. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/23/2020 | Review proposed mediation pre-conference dates and emails with Pechman re: scheduling. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/23/2020 | Telephone calls with Jose Franco, Jacobo Hernandez, Jesus Ramirez, Stevens Hernandez Deniz Lobo, Luis Martinez, and Angel Lobo to make determinations re: representatives at mediation. Leave voice messages for Rodolfo Romero and Raul Patino. | 1.30 | \$275.00 | \$357.50 |
| GB | 10/26/2020 | Telephone call with Romero re: selecting representatives for mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/27/2020 | Email to Harrison re damage calculations. | 0.10 | \$275.00 | \$27.50 |
| LP | 10/27/2020 | Review correspondence on damage calculations and issues re: 6 year sol cutoff. | 0.10 | \$600.00 | \$60.00 |
| GB | 10/28/2020 | Draft case overview for Pechman for guidance during premediation | 1.10 | \$275.00 | \$302.50 |

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| conference on 10/30. | | | | | |
| GB | 10/28/2020 | Telephone call with Franco to review pay rates. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/28/2020 | Email to Goodman following up re: status of supplemental production. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/28/2020 | Email to Cuevos (JAMS) with attendance list from PLG for mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 10/28/2020 | Revise Franco calculations to reflect hourly rate of pay and send final compiled calculations to Harrison. | 0.40 | \$275.00 | \$110.00 |
| LP | 10/30/2020 | Prep for call with mediator. | 0.40 | \$600.00 | \$240.00 |
| LP | 10/30/2020 | Conference call with mediator and counsel. | 0.30 | \$600.00 | \$180.00 |
| GB | 11/03/2020 | Telephone call with Goodman re: production of documents. Should have by 11/4. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/04/2020 | Review notes from client meetings, discovery productions, and settlement agreements in previous cases. Begin drafting mediation statement sections on relevant facts and procedural history, and issues in dispute. | 4.10 | \$275.00 | \$1,127.50 |
| GB | 11/05/2020 | Continue drafting mediation statement; draft arguments regarding status of alleged subcontractor organizations, | 1.50 | \$275.00 | \$412.50 |

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| | | and sections on damage calculations and history of negotiations. | | | |
| GB | 11/06/2020 | Email to Goodman re: status of supplemental production of documents. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/06/2020 | Download and save supplemental production from defendants. | 0.20 | \$275.00 | \$55.00 |
| GB | 11/06/2020 | Revise mediation statement and begin identifying exhibits from among document productions. | 1.30 | \$275.00 | \$357.50 |
| LP | 11/06/2020 | Review draft mediation statement. | 0.60 | \$600.00 | \$360.00 |
| GB | 11/06/2020 | Email to Harrison with draft mediation statement. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/09/2020 | Telephone call with Stevens Hernandez re: case update. Informed that we will be scheduling a Zoom meeting to discuss mediation for 11/13. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/09/2020 | Discussion with Luz Ortega, paralegal, re: arranging Zoom call with clients pre-mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/09/2020 | Revisions to mediation statement and begin creating exhibits. | 1.10 | \$275.00 | \$302.50 |
| LP | 11/10/2020 | Review and revise mediation statement. | 0.30 | \$600.00 | \$180.00 |
| GB | 11/10/2020 | Incorporate Pechman | 1.80 | \$275.00 | \$495.00 |

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| | | revisions to mediation statement and finalize exhibits. Send to Pechman and Harrison for review. | | | |
| GB | 11/10/2020 | Discussion of scheduling group Zoom meeting with Ortega and working around clients' schedules. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/10/2020 | Incorporate Harrison revisions to mediation statement. Final review of statement for any errors. Attach exhibits. Draft email to Michael Sonnenberg, mediator, and send mediation statement and exhibits. | 0.70 | \$275.00 | \$192.50 |
| GB | 11/11/2020 | Review damage calculations and create talking points sheet for group meeting with clients. | 0.80 | \$275.00 | \$220.00 |
| GB | 11/12/2020 | Review notes and telephone conference with Pechman and Titan clients to explain mediation and resolve any outstanding issues with clients. | 0.80 | \$275.00 | \$220.00 |
| LP | 11/12/2020 | Prep for call with clients. | 0.30 | \$600.00 | \$180.00 |
| LP | 11/12/2020 | Zoom call with clients in anticipation of mediation, | 0.60 | \$600.00 | \$360.00 |
| GB | 11/12/2020 | Discussion with Morales re: meeting with clients and confidentiality stipulation for mediation. | 0.10 | \$275.00 | \$27.50 |

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| GB | 11/12/2020 | Telephone call with Franco Lagos re: mediation agreement. Attempt to reach Ramirez re: mediation agreement. Send mediation agreement through Docusign. | 0.40 | \$275.00 | \$110.00 |
| GB | 11/13/2020 | Attempt to reach Ramirez re: mediation confidentiality stipulation. No answer. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/13/2020 | WhatsApp message to Ramirez re: confidentiality stipulation for mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/13/2020 | Discussion with Ortega re: messages to Titan clients regarding SS and ITIN numbers. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/13/2020 | Telephone call with Ramirez re: confidentiality stipulation and ITIN. To Docusign and return confidentiality stipulation. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/13/2020 | Execute mediation agreement. Email mediation agreements executed by Baynes, Morales, and Franco Lagos to JAMS. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/16/2020 | Download and send mediation agreement executed by Ramirez to JAMS | 0.10 | \$275.00 | \$27.50 |
| GB | 11/16/2020 | Send WhatsApp link to Jose and Jesus with password for Zoom mediation. | 0.10 | \$275.00 | \$27.50 |

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| GB | 11/16/2020 | Discussion with Pechman and email to Harrison re: call in anticipation of mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/16/2020 | Telephone call with Franco to answer questions prior to mediation. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/16/2020 | Telephone call with Pechman and Harrison to discuss strategy in preparation for mediation. | 0.30 | \$275.00 | \$82.50 |
| LP | 11/16/2020 | Telephone conference with David Harison and Baynes re: strategy for mediation. | 0.30 | \$600.00 | \$180.00 |
| GB | 11/17/2020 | Review mediation statement, damages, and case file in preparation for mediation. | 0.70 | \$275.00 | \$192.50 |
| VM | 11/17/2020 | Attend mediation. | 10.60 | \$400.00 | \$4,240.00 |
| LP | 11/17/2020 | Strategy discussions with Baynes and Morales throughout mediation. | 1.50 | \$600.00 | \$900.00 |
| GB | 11/17/2020 | Attend virtual mediation conference. | 10.60 | \$275.00 | \$2,915.00 |
| LP | 11/17/2020 | Review issues regarding memorandum of agreement. | 0.40 | \$600.00 | \$240.00 |
| GB | 11/18/2020 | Discussion with Pechman and Morales re drafting settlement agreement and group call with clients. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/18/2020 | Email to Goodman and Grindlinger re: drafting settlement agreement. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/18/2020 | Telephone call with Jose | 0.10 | \$275.00 | \$27.50 |

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| | | Franco following up re: question about distributions. | | | |
| GB | 11/18/2020 | Conference call with Titan clients to discuss distributions. | 0.60 | \$275.00 | \$165.00 |
| VM | 11/18/2020 | Conference call with Titan clients to discuss distributions. | 0.60 | \$400.00 | \$240.00 |
| VM | 11/18/2020 | Discussion with Pechman and Baynes regarding settlement distribution. | 0.20 | \$400.00 | \$80.00 |
| LP | 11/18/2020 | Discussion with Morales and Baynes re: settlement agreement. | 0.10 | \$600.00 | \$60.00 |
| VM | 11/18/2020 | Discussion with Pechman and Baynes re: drafting settlement agreement. | 0.10 | \$400.00 | \$40.00 |
| GB | 11/19/2020 | Review WhatsApp messages from Titan clients and discussion with Pechman and Morales re: response. | 0.40 | \$275.00 | \$110.00 |
| LP | 11/19/2020 | Telephone conference with Harrison regarding settlement issues. | 0.20 | \$600.00 | \$120.00 |
| GB | 11/19/2020 | Attempt to reach Romero to provide information re: settlement (was not on group call). Leave voice message. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/19/2020 | WhatsApp messages with Patino re: issues regarding start date. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/19/2020 | Telephone call with Romero re: settlement distributions | 0.20 | \$275.00 | \$55.00 |

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| and next steps. | | | | | |
| GB | 11/19/2020 | Telephone call with Morales, Harrison, and Salwen re: distributions and finalizing costs. | 0.30 | \$275.00 | \$82.50 |
| GB | 11/19/2020 | Telephone call with Pechman and Morales re: strategies for smoothing over issues with distributions. | 0.60 | \$275.00 | \$165.00 |
| GB | 11/19/2020 | Review expenses and email to Harrison re: PLG expenses. | 0.10 | \$275.00 | \$27.50 |
| VM | 11/19/2020 | Discussion with Baynes and Pechman regarding distribution of settlement funds to Plaintiffs. | 0.20 | \$400.00 | \$80.00 |
| VM | 11/19/2020 | Telephone call with Harrison, Salwen, and Baynes regarding distribution of settlement funds to Plaintiffs. | 0.20 | \$400.00 | \$80.00 |
| GB | 11/20/2020 | Continued review of distributions and email to Pechman and Morales re: strategy for dealing with splits between Stevens and A. Lobo, Raul Patino, and clients with lowest percentages. | 0.50 | \$275.00 | \$137.50 |
| GB | 11/20/2020 | Email to JAMS re: final bill to finalize costs. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/20/2020 | Telephone call with Patino re: distributions. | 0.10 | \$275.00 | \$27.50 |

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| GB | 11/20/2020 | Telephone call with Stevens Hernandez re damages distributions. | 0.20 | \$275.00 | \$55.00 |
| GB | 11/20/2020 | Telephone call with Franco Lagos and Morales re: distributions and steps taken to address Franco Lagos concerns. | 0.20 | \$275.00 | \$55.00 |
| VM | 11/20/2020 | Telephone call with Jose Franco and Baynes re: settlement distribution; recap with Pechman regarding same. | 0.80 | \$400.00 | \$320.00 |
| GB | 11/20/2020 | Discussion with Pechman and Morales re: distributions and debrief conversations with clients. | 0.60 | \$275.00 | \$165.00 |
| LP | 11/20/2020 | Review issues with Baynes and Morales re: settlement distribution. | 0.40 | \$600.00 | \$240.00 |
| GB | 11/23/2020 | Telephone call with Angel Lobo re distributions. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/23/2020 | Email to JAMS re: final bill. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/23/2020 | Emails to Harrison and Salwen re: distributions and email to Goodman re: status of draft agreement. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/23/2020 | Telephone call with Fajardo (JAMS) re: awaiting final bill. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/23/2020 | Review JAMS bill and email to Harrison re: costs in light of bill. | 0.10 | \$275.00 | \$27.50 |

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| VM | 11/24/2020 | Create spreadsheet with settlement distributions for plaintiffs and plaintiffs' attorneys fees. | 0.70 | \$400.00 | \$280.00 |
| GB | 11/24/2020 | Telephone call with Jacobo Hernandez re: distributions and following up re: ITIN. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/25/2020 | Calls with Jose Franco, Stevens Hernandez, Deniz Lobo, Jesus Ramirez, Luis Martinez, Angel Lobo, Raul Patino, and Jacobo Hernandez re final distributions. | 0.60 | \$275.00 | \$165.00 |
| GB | 11/30/2020 | Review and edit settlement agreement and discussion with Pechman and Morales re: revisions. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/30/2020 | Email to Grindlinger and Goodman re: consent to magistrate jurisdiction. Attached executed consent form. | 0.10 | \$275.00 | \$27.50 |
| VM | 11/30/2020 | Telephone call with Pechman and Baynes regarding edits to settlement agreement | 0.20 | \$400.00 | \$80.00 |
| GB | 11/30/2020 | Review case law re: consent to magistrate jurisdiction where all defendants have not appeared in a matter. | 0.40 | \$275.00 | \$110.00 |
| GB | 11/30/2020 | Discussion of revisions to draft settlement agreement with Pechman and Morales. | 0.30 | \$275.00 | \$82.50 |

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| GB | 11/30/2020 | Email to Harrison with proposed strategy re: dismissing non-appearing defendants and consenting to MJ jurisdiction. | 0.10 | \$275.00 | \$27.50 |
| GB | 11/30/2020 | Draft letter to Judge Torres re: notice of settlement and steps parties intend to take to fully resolve this matter. Send to Pechman and Morales for review. Incorporate Pechman revisions and send to Grindlinger for review. | 0.80 | \$275.00 | \$220.00 |
| VM | 11/30/2020 | Edit Settlement Agreement. | 0.80 | \$400.00 | \$320.00 |
| LP | 11/30/2020 | Review settlement agreement and discussions with Baynes and Morales re: same. | 0.40 | \$600.00 | \$240.00 |
| LP | 11/30/2020 | Review email exchanges and discussion with Baynes about voluntary dismissal of non-appearing defendants. | 0.20 | \$600.00 | \$120.00 |
| GB | 11/30/2020 | Review and revise settlement agreement. | 0.70 | \$275.00 | \$192.50 |
| GB | 11/30/2020 | Draft notice of voluntary dismissal as to non-Titan Defendants. | 0.20 | \$275.00 | \$55.00 |
| GB | 12/01/2020 | Incorporate Pechman revisions to settlement agreement and stipulation and send to Harrison and Salwen. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/01/2020 | Discussion of final JAMS | 0.10 | \$275.00 | \$27.50 |

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| invoice with Pechman. | | | | | |
| GB | 12/01/2020 | Email to Harrison and Salwen re: letter to Judge Torres and voluntary dismissal of non-Titan defendants. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/01/2020 | Finalize and file letter to Judge Torres re: settlement and notice of voluntary dismissal of non-Titan defendants. | 0.50 | \$275.00 | \$137.50 |
| VM | 12/01/2020 | Review e-mail from Goodman regarding edits to settlement agreement. | 0.20 | \$400.00 | \$80.00 |
| GB | 12/02/2020 | Contact clerk's office re: filing consent to magistrate form; email to clerk's office providing consent to magistrate form. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/02/2020 | Begin drafting letter-motion for approval of settlement; complete procedural and factual history section; complete section on fairness and reasonableness of settlement terms; begin drafting section on reasonableness of attorneys' fees. | 3.50 | \$275.00 | \$962.50 |
| LP | 12/02/2020 | Review Orders granting Voluntary dismissal and referral to Magistrate Moses. | 0.10 | \$600.00 | \$60.00 |
| GB | 12/02/2020 | Review and save Judge Torres orders approving voluntary dismissal of non- | 0.10 | \$275.00 | \$27.50 |

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| | | Titan defendants and referring case to Judge Moses for further proceedings. | | | |
| GB | 12/03/2020 | Continue drafting letter-motion for approval of settlement; complete section on reasonableness of attorneys' fees; add pincite references to settlement agreement and perform cite checks; review and send to Pechman and Morales for edits. | 1.80 | \$275.00 | \$495.00 |
| LP | 12/03/2020 | Review Order of Judge Moses re: Checks submission requirements. | 0.10 | \$600.00 | \$60.00 |
| GB | 12/03/2020 | Download and review Judge Moses order re: submission of settlement materials; calendar deadline. | 0.10 | \$275.00 | \$27.50 |
| LP | 12/03/2020 | Review revised payment schedule. | 0.10 | \$600.00 | \$60.00 |
| GB | 12/03/2020 | Review proposed revisions to payment schedule provided by Salwen and email to Pechman and Morales re: same. Email to Salwen re: discussion of pre-dating checks and advising re: status of draft fairness letter. | 0.20 | \$275.00 | \$55.00 |
| GB | 12/04/2020 | Incorporate Pechman and Morales revisions to letter-motion for settlement approval. Send to Harrison | 0.50 | \$275.00 | \$137.50 |

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| | | and Salwen for review. | | | |
| GB | 12/08/2020 | Telephone call with Stevens Hernandez re: status of settlement agreement, questions re distribution of checks once received. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/11/2020 | Telephone cal with Jesus Ramirez re: status of settlement agreement, waiting on final revisions from opposing counsel. | 0.10 | \$275.00 | \$27.50 |
| LP | 12/15/2020 | Review defense counsel's revisions to settlement agreement. | 0.10 | \$600.00 | \$60.00 |
| GB | 12/15/2020 | Review proposed revisions to final agreement provided by opposing counsel. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/15/2020 | Discussion with Morales re: strategy for review of settlement agreement with PLG clients once execution copy is ready to be sent out. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/15/2020 | Telephone call with Harrison re: Goodman's request that Titan LLC be dismissed with prejudice, while individual defendants Juan and Jose Inaky be dismissed without prejudice. Discuss with Pechman and Morales. | 0.30 | \$275.00 | \$82.50 |
| GB | 12/16/2020 | Review proposed stipulation of dismissal without prejudice as to individual defendants provided by Goodman. | 0.10 | \$275.00 | \$27.50 |

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| GB | 12/16/2020 | Final hard review of settlement agreement and send minor revisions to Salwen. | 0.50 | \$275.00 | \$137.50 |
| GB | 12/16/2020 | Email to Salwen re: signature line for Jacobo Hernandez. Prepare settlement agreement to go out to clients through DocuSign for execution. | 0.40 | \$275.00 | \$110.00 |
| GB | 12/16/2020 | WhatsApp messages to clients confirming emails for delivery of settlement agreement via DocuSign. | 0.30 | \$275.00 | \$82.50 |
| GB | 12/16/2020 | Telephone call with Patino confirming email address to send settlement agreement; attempt to reach Jacobo Hernandez, no answer. | 0.10 | \$275.00 | \$27.50 |
| VM | 12/16/2020 | Review final version of settlement agreement and distribution exhibits. | 0.20 | \$400.00 | \$80.00 |
| GB | 12/16/2020 | Telephone calls with Jose Franco, Angel Lobo, and Deniz Lobo to review settlement agreement. Telephone call with Stevens Hernandez--needs agreement to be resent. | 0.90 | \$275.00 | \$247.50 |
| GB | 12/17/2020 | Review and accept Goodman revisions to letter-motion for approval of settlement. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/17/2020 | Additional attempt to reach Jacobo Hernandez. No | 0.10 | \$275.00 | \$27.50 |

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| | | answer. Discussion with Brito re: reaching on WhatsApp. | | | |
| VM | 12/17/2020 | Telephone calls to Titan plaintiffs to review agreement. | 1.50 | \$400.00 | \$600.00 |
| GB | 12/17/2020 | Continued attempts to reach Jacobo Hernandez via WhatsApp calls. No response. Discussion with Morales re: obtaining additional contact information from other clients. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/17/2020 | Telephone call with Jacobo Hernandez to review agreement and continued discussion of need to apply for ITIN. Is speaking with an accountant about submitting application. | 0.40 | \$275.00 | \$110.00 |
| VM | 12/17/2020 | Telephone call with Jesus Ramirez re: signing agreement. | 0.50 | \$400.00 | \$200.00 |
| GB | 12/17/2020 | Telephone call with Stevens Hernandez to review agreement. | 0.40 | \$275.00 | \$110.00 |
| VM | 12/17/2020 | Calls to Plaintiffs to sign agreement. | 0.20 | \$400.00 | \$80.00 |
| GB | 12/17/2020 | Download settlement agreement signed by all clients but Stevens Hernandez. Resend to correct Hernandez email for signature. | 0.10 | \$275.00 | \$27.50 |

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| GB | 12/18/2020 | Email to Harrison and Salwen re: Goodman revisions to fairness agreement, preparing exhibits, and execution of agreement by clients. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/21/2020 | Review and respond to Harrison email re: revisions to letter-motion for approval and billing records. Email to Goodman re: executed version of agreement from defendants. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/21/2020 | Update client addresses on Clio and conversation with Brito re: collecting W-9s from clients. | 0.20 | \$275.00 | \$55.00 |
| GB | 12/21/2020 | Emails with Goodman re: exchange of settlement signature pages. | 0.10 | \$275.00 | \$27.50 |
| GB | 12/21/2020 | Review PLG billing records for errors and duplicate entries. | 0.50 | \$275.00 | \$137.50 |
| GB | 12/21/2020 | Incorporate Harrison revisions, lodestar information, and translation of PLG retainer contingency provision into letter-motion for approval and prepare exhibits. Send letter-motion to Goodman for final review. | 0.70 | \$275.00 | \$192.50 |
| GB | 12/22/2020 | Review Goodman email re: fairness letter and stipulation of voluntary dismissal without prejudice of individual defendants. Email | 0.20 | \$275.00 | \$55.00 |

to Harrison re: status of final signature on settlement agreement and executing voluntary dismissal.

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| GB | 12/22/2020 | Print and compile agreement executed by plaintiffs. Email to Goodman providing agreement executed by plaintiffs, confirming initial filing of voluntary dismissal, and inquiring re filing of confessions of judgment with agreement. | 0.40 | \$275.00 | \$110.00 |
| GB | 12/22/2020 | Final revision to letter-motion for approval; merge defendants signature page into agreement for filing and finalize exhibits; file notice of voluntary dismissal without prejudice of individual defendants and letter-motion for approval of settlement. | 0.60 | \$275.00 | \$165.00 |

Expenses

| Type | Date | Notes | Quantity | Rate | Total |
|---------|------------|---|----------|--------------|--------------------|
| Expense | 04/27/2020 | Payment to Alexander Poole for service of amended complaint on non-appearing corporate defendants via secretary of state. | 1.00 | \$180.00 | \$180.00 |
| Expense | 10/28/2020 | JAMS deposit for Sonnenberg mediation fees. | 1.00 | \$2,425.00 | \$2,425.00 |
| | | | | Total | \$62,475.00 |

Detailed Statement of Account

Current Invoice

| Invoice Number | Due On | Amount Due | Payments Received | Balance Due |
|--------------------------|------------|-------------|-------------------|-------------|
| 38 | 12/22/2020 | \$62,475.00 | \$0.00 | \$62,475.00 |
| Outstanding Balance | | | | \$62,475.00 |
| Amount in Trust | | | | \$0.00 |
| Total Amount Outstanding | | | | \$62,475.00 |